

DATE: October 4, 1984

TO: Division File ✓

FROM: Ken Mensing - LPC - Collinsville *KAM*

SUBJECT: LPC 1630450038 - St. Clair County - East St. Louis/Wastex #2

EPA Region 5 Records Ctr.



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On October 2, 1984, Agency Attorney Phil Van Ness and I went to the subject facility and met with various Wastex Research personnel, including President James Markle and their Attorney, Thomas Immel.

After brief introductions, Phil and I were given a tour of the facility by Messrs. Markle, Burroughs and Immel. This tour and meeting were characterized as being for informational purposes and for Wastex to show and explain their procedures and facility conditions.

We were shown the various aspects of their operations, including storage and blending tanks, drums of various wastes in storage, the area where they mix wastes with sawdust, the sawdust waste pile located off-site, and various equipment which was not in operation.

Some specific observations and conversations were as follows: The impoundment area under the horizontal storage tanks did not contain any liquid and in fact was observed to be completely concrete and recently painted. In the area where wastes are mixed with sawdust, there were many drums which had their tops or lids removed. Discussions with Jim Markle revealed that some of the drums were old ones brought in by Jack Chase and that some of the drums had been recently accepted by Wastex. During discussions involving the off-site sawdust waste pile, I asked them why initially they claimed the waste pile was hazardous and then subsequently claimed that it was non-hazardous. Mr. Markle said that there was a mixup or misunderstanding regarding the determination for ignitability and that a subsequent analysis revealed the material to be non-hazardous. I told them that I was aware that some materials that they have mixed with sawdust have been disposed of as a hazardous waste and some as a non-hazardous waste. Mr. Markle and Mr. Burroughs said that they have analyses performed to see whether the waste exhibits any hazardous waste characteristics and then decide on the proper disposal option. I asked them if they ever analyzed the material for listed hazardous wastes. Mr. Markle and Mr. Burroughs indicated no. I then asked them how they knew or could determine that specific listed hazardous wastes were not being mixed with the sawdust. Mr. Markle and Mr. Burroughs said that they were knowledgeable and aware of the materials being mixed with sawdust and were confident that listed wastes and specifically chlorinated organic wastes had not been mixed with the sawdust comprising the existing off-site waste pile. Messrs. Markle, Burroughs and Immel stated that the wastepile would be considered hazardous if it contained listed hazardous wastes. As we observed the remaining portion of the wastepile, Mr. Markle indicated that the last few truckloads of the waste would be hauled to the landfill in Michigan very shortly. Mr. Markle also indicated that the landfill had had an analyses performed on the waste in the waste pile and were satisfied that the waste was non-hazardous.

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Following the completion of the tour, we all gathered in Mr. Markle's office for further discussions. The two main topics were the format of the monthly report and the contention by Wastex that short duration waste permits were adversely affecting their business by sending negative signals to their clients.

KGM:jlr

cc: Southern Region File
Phil Van Ness

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REMARKS

1630450038 - St. Clair County
East St. Louis/Wastex
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Wastex Research in East St. Louis is a blender of hazardous waste fuel. The facility accepts waste from generators and blends the wastes to be reused as fuel. Two grades of fuel are blended at the facility. Asphalt grade fuel is the higher grade. Organic concentrations are kept at a minimum in order to produce a cleaner burning fuel. Currently, there is 160,000 gallons of this fuel on site. It is to be sold to Central Missouri Paving in Moberly, MO. Terry Hein said they will need at least 175,000 gallons this season. The lower grade fuel is used by a cement kiln. The fuel can contain designated amounts of solids and organic concentrations and may have a higher BTU value. There are 189,000 gallons of this type of fuel on site. Continental Cement in Hannibal, MO accepts this fuel for use in its cement kiln. Per Terry Hein, at least 4 loads per week will be shipped in May and 151,000 gallons are ready for shipping. Wastex manages its hazardous wastes using the following methods; storage in containers (S01), storage and treatment in tanks (S02), and storage in a waste pile (S03). USEPA acknowledges the August 27, 1980 Part A only. This Part A does not include storage in a waste pile. Currently, negotiations are being conducted with Peoria Disposal Company in Peoria and CECOS in Livingston, LA to accept the contents of the waste pile for landfill disposal. The waste was sampled on February 4, 1988, by PDC, and CECOS sampled the pile on April 5, 1988. The results of the analysis will determine the disposition of the waste pile.

Wastex has not been engaged in any processing operations or drum pumping since 12/87. The facility has, however, been accepting wastes for storage. The majority of waste accepted has been in bulk loads shipped by Superior Equipment. Due to this increase in inventory, four new tanks, FT1, FT2, FT3, and FT4, have been added. Wastex has also been utilizing their bulk tank trailers for storage purposes. The tank trailers are no longer used for transport, as Wastex will not be renewing its transporter permits. Trans Truck will be transporting all outgoing fuel and waste for this facility.

On July 31, 1987, a Consent Decree was signed covering some of the apparent violations observed during previous inspections. The Consent Decree was issued in two parts. One being the operations of the facility and the associated handling of Wastex waste. The other part addressed the Chase inventory. The Chase inventory consists of approximately 3,715 drums which are stored in Buildings 35, 16-31, and 3-22. These drums have been at the facility since Mr. Markle purchased the facility. A compliance program has been established in the Consent Decree to eliminate the inventory of Chase drums in a 15 month period. Since the Decree has elected to address the Chase inventory separately, they were not included as part of this ISS inspection.

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